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**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF  
**Date:** Friday, March 21, 2025 at 5:42:59 PM Pacific Daylight Time  
**From:** Skye Lovett  
**To:** Stuter, Ursula@CDCR  
**CC:** Audrey Barron, Jerrod Thompson, Davis, Tamiya@CDCR, Ed Swanson, Penny Godbold, Patrick Booth, Team PLO Armstrong, RBGG Armstrong Team, Stafford, Carrie@CDCR, Neill, Jennifer@CDCR, Sharon Garske, Trace Maiorino, Anne Kammer, Olena Likhachova, Burkart, Brianne@CDCR, Thao, Chor@CDCR, Lorey, Dawn@CDCR, White, Lourdes@CDCR, Dumalig, Sylvia@CDCR, Ruiz, Ramon@CDCR, Lau-Silveira, Ava, Meyer, Nicholas@CDCR, Riley, Katie, CDCR OLA Armstrong CLU, Williams, Joseph@CDCR  
**Attachments:** 25.03.21 Arm Plfs' Information Requests and Proposals re Captioning Demonstration.pdf

Hi all,

Plaintiffs are available on May 7 for a meeting at Elk Grove to view the technology Defendants have identified. We also are available on May 5, May 6, May 12, May 14, or May 15 for an in-prison demonstration.

Attached please find Plaintiffs' information requests and proposed parameters for the meeting at Elk Grove and in-prison demonstration. As you'll see in the attached, we ask to meet regarding the parameters we've proposed as soon as possible in advance of the demonstration.

Thank you,  
Skye

On Fri, Mar 21, 2025 at 4:14 PM Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)> wrote:

In follow up, we can host a demo in Elk Grove on **May 7 from 11 AM to 2 PM**.  
Address to follow, upon confirmation of this date for the parties.

~~~~~  
*Ursula Stuter*

Attorney, CDCR

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**From:** Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>  
**Sent:** Friday, March 21, 2025 3:58 PM  
**To:** Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>; Jerrod Thompson <[jthompson@prisonlaw.com](mailto:jthompson@prisonlaw.com)>; Davis, Tamiya@CDCR <[Tamiya.Davis@cdcr.ca.gov](mailto:Tamiya.Davis@cdcr.ca.gov)>  
**Cc:** Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>; Penny Godbold <[pgodbold@rbgg.com](mailto:pgodbold@rbgg.com)>; Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>; Team PLO Armstrong <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>; RBGG Armstrong Team <[ArmstrongTeam@rbgg.com](mailto:ArmstrongTeam@rbgg.com)>; Stafford, Carrie@CDCR <[Carrie.Stafford@cdcr.ca.gov](mailto:Carrie.Stafford@cdcr.ca.gov)>; Neill, Jennifer@CDCR <[Jennifer.Neill@cdcr.ca.gov](mailto:Jennifer.Neill@cdcr.ca.gov)>; Sharon Garske <[Sharon.garske@doj.ca.gov](mailto:Sharon.garske@doj.ca.gov)>; Trace Maiorino <[Trace.Maiorino@doj.ca.gov](mailto:Trace.Maiorino@doj.ca.gov)>; Anne Kammer <[anne.kammer@doj.ca.gov](mailto:anne.kammer@doj.ca.gov)>; Olena Likhachova <[olena.likhachova@doj.ca.gov](mailto:olena.likhachova@doj.ca.gov)>; Burkart, Brianne@CDCR <[Brianne.Burkart@cdcr.ca.gov](mailto:Brianne.Burkart@cdcr.ca.gov)>; Thao, Chor@CDCR <[Chor.Thao@cdcr.ca.gov](mailto:Chor.Thao@cdcr.ca.gov)>; Lorey, Dawn@CDCR <[Dawn.Lorey@cdcr.ca.gov](mailto:Dawn.Lorey@cdcr.ca.gov)>; White, Lourdes@CDCR <[Lourdes.White@cdcr.ca.gov](mailto:Lourdes.White@cdcr.ca.gov)>; Dumalig, Sylvia@CDCR <[Sylvia.Dumalig@cdcr.ca.gov](mailto:Sylvia.Dumalig@cdcr.ca.gov)>; Ruiz, Ramon@CDCR <[ramon.ruiz@cdcr.ca.gov](mailto:ramon.ruiz@cdcr.ca.gov)>; Lau-Silveira, Ava <[Ava.Lau-Silveira@cdcr.ca.gov](mailto:Ava.Lau-Silveira@cdcr.ca.gov)>; Meyer, Nicholas@CDCR <[Nicholas.Meyer@cdcr.ca.gov](mailto:Nicholas.Meyer@cdcr.ca.gov)>; Riley, Katie <[Katie.Riley@cdcr.ca.gov](mailto:Katie.Riley@cdcr.ca.gov)>; CDCR OLA Armstrong CLU <[m\\_OLAArmstrongCLU@cdcr.ca.gov](mailto:m_OLAArmstrongCLU@cdcr.ca.gov)>; Williams, Joseph@CDCR <[Joseph.Williams@cdcr.ca.gov](mailto:Joseph.Williams@cdcr.ca.gov)>  
**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF

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Thanks, Ursula. We're not available May 1 or 2. We're flexible May 5-7 and May 12-15.

Thanks,

Audrey Barron

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**From:** Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>  
**Date:** Friday, March 21, 2025 at 1:44 PM  
**To:** Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>, Jerrod Thompson <[jthompson@prisonlaw.com](mailto:jthompson@prisonlaw.com)>, Davis, Tamiya@CDCR <[Tamiya.Davis@cdcr.ca.gov](mailto:Tamiya.Davis@cdcr.ca.gov)>  
**Cc:** Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>, Penny Godbold <[pgodbold@rbgg.com](mailto:pgodbold@rbgg.com)>, Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>, Team PLO Armstrong <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>, RBGG

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**Subject:** RE: Armstrong: Defendants' Update on Transcription Technology at SATF

Hi Audrey,

We're now looking at May dates. Based on Jerrod's inquiry, we are reevaluating options. I would like to suggest that we retain a May demo in Elk Grove (non-institution) and that we can further discuss other locations, once the "easy" demo is completed.

Please advise if amenable. May 1 and 2 are options for an EG-only demo.

~~~~~  
*Ursula Stuter*

Attorney, CDCR

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**From:** Audrey Barron <[audrey@smlp.law](mailto:audrey@smlp.law)>

**Sent:** Friday, March 21, 2025 12:36 PM

**To:** Jerrod Thompson <[jthompson@prisonlaw.com](mailto:jthompson@prisonlaw.com)>; Davis, Tamiya@CDCR <[Tamiya.Davis@cdcr.ca.gov](mailto:Tamiya.Davis@cdcr.ca.gov)>

**Cc:** Ed Swanson <[ed@smlp.law](mailto:ed@smlp.law)>; Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>; Penny Godbold <[pgodbold@rbgg.com](mailto:pgodbold@rbgg.com)>; Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>; Team PLO

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**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF

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Hi all,

I'm following up on the below. We would like to get something scheduled before calendars fill up.

Thanks,

Audrey Barron

---

**From:** Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>

**Date:** Tuesday, March 11, 2025 at 7:23 PM

**To:** Jerrod Thompson <[jthompson@prisonlaw.com](mailto:jthompson@prisonlaw.com)>, Tamiya@CDCR Davis <[tamiya.davis@cdcr.ca.gov](mailto:tamiya.davis@cdcr.ca.gov)>

**Cc:** Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>, Ursula@CDCR Stuter <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>, Penny Godbold <[pgodbold@rbgg.com](mailto:pgodbold@rbgg.com)>, Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>, Team PLO Armstrong <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>, RBGG Armstrong Team <[ArmstrongTeam@rbgg.com](mailto:ArmstrongTeam@rbgg.com)>, Carrie@CDCR Stafford <[Carrie.Stafford@cdcr.ca.gov](mailto:Carrie.Stafford@cdcr.ca.gov)>, Jennifer@CDCR Neill <[Jennifer.Neill@cdcr.ca.gov](mailto:Jennifer.Neill@cdcr.ca.gov)>, Sharon Garske

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**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF

Hi all,

Ed and I are unavailable the last week of April. April 18 would be ideal if possible. We could also do April 14, April 15 after 12:00pm, April 21, or April 22. If those dates do not work, we can look at May.

Thanks,

Audrey Barron

---

**From:** Jerrod Thompson <[jthompson@prisonlaw.com](mailto:jthompson@prisonlaw.com)>

**Date:** Tuesday, March 11, 2025 at 5:44 PM

**To:** Tamiya@CDCR Davis <[tamiya.davis@cdcr.ca.gov](mailto:tamiya.davis@cdcr.ca.gov)>

**Cc:** Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>, Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>, Ursula@CDCR Stuter <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>, Penny Godbold <[pgodbold@rbgg.com](mailto:pgodbold@rbgg.com)>, Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>, Team PLO Armstrong <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>, RBGG Armstrong Team <[ArmstrongTeam@rbgg.com](mailto:ArmstrongTeam@rbgg.com)>, Carrie@CDCR Stafford <[Carrie.Stafford@cdcr.ca.gov](mailto:Carrie.Stafford@cdcr.ca.gov)>, Jennifer@CDCR Neill <[Jennifer.Neill@cdcr.ca.gov](mailto:Jennifer.Neill@cdcr.ca.gov)>, Sharon Garske <[Sharon.garske@doj.ca.gov](mailto:Sharon.garske@doj.ca.gov)>, Trace Maiorino <[Trace.Maiorino@doj.ca.gov](mailto:Trace.Maiorino@doj.ca.gov)>, Anne Kammer <[anne.kammer@doj.ca.gov](mailto:anne.kammer@doj.ca.gov)>, Olena Likhachova <[olena.likhachova@doj.ca.gov](mailto:olena.likhachova@doj.ca.gov)>, Brianne@CDCR Burkart <[Brianne.Burkart@cdcr.ca.gov](mailto:Brianne.Burkart@cdcr.ca.gov)>, Chor@CDCR Thao <[Chor.Thao@cdcr.ca.gov](mailto:Chor.Thao@cdcr.ca.gov)>, Dawn@CDCR Lorey <[dawn.lore@cdcr.ca.gov](mailto:dawn.lore@cdcr.ca.gov)>, Lourdes@CDCR White <[Lourdes.White@cdcr.ca.gov](mailto:Lourdes.White@cdcr.ca.gov)>, Sylvia@CDCR Dumalig <[Sylvia.Dumalig@cdcr.ca.gov](mailto:Sylvia.Dumalig@cdcr.ca.gov)>, Ramon@CDCR Ruiz <[ramon.ruiz@cdcr.ca.gov](mailto:ramon.ruiz@cdcr.ca.gov)>, Ava Lau-Silveira <[Ava.Lau-Silveira@cdcr.ca.gov](mailto:Ava.Lau-Silveira@cdcr.ca.gov)>, Nicholas@CDCR Meyer <[Nicholas.Meyer@cdcr.ca.gov](mailto:Nicholas.Meyer@cdcr.ca.gov)>, Katie Riley <[Katie.Riley@cdcr.ca.gov](mailto:Katie.Riley@cdcr.ca.gov)>, CDCR OLA Armstrong CLU <[m\\_OLAArmstrongCLU@cdcr.ca.gov](mailto:m_OLAArmstrongCLU@cdcr.ca.gov)>, Joseph@CDCR Williams <[Joseph.Williams@cdcr.ca.gov](mailto:Joseph.Williams@cdcr.ca.gov)>

**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF

Thank you Tamiya-

We appreciate Defendants' efforts to get this technology ready for a demonstration and can be available on either of the proposed dates. That said, we do not agree that a demonstration at Elk Grove alone will provide sufficient opportunity to evaluate the technology as it will be used in a prison environment, and we ask that the parties schedule an in-prison demonstration either in addition to or in place of the demonstration at Elk Grove. Consistent with the Court's order regarding the ViewSonic demonstration, the demonstration also should be conducted in "various institutional settings," and we ask that Defendants ensure that a subject matter expert is present to answer questions regarding the technology's capabilities. See Dkt. No. 3538 at 8. In light of Defendants' concern about travel, we would be willing to have the demonstration at a prison near Elk Grove.

Plaintiffs will provide our information requests and other proposals for the in-prison demonstration as soon as possible.

Thank you

Jerrold Thompson

Prison Law Office

On Mar 11, 2025, at 11:53 AM, Davis, Tamiya@CDCR  
<[Tamiya.Davis@cdcr.ca.gov](mailto:Tamiya.Davis@cdcr.ca.gov)> wrote:

Ed and Plaintiffs' Counsel:

CDCR and CCHCS continue to test the new captioning technology we've described in our email. There are a few more site and usage tests to complete to ensure we have a viable solution. With that in mind, and due

to the number of individuals who would like to attend a demonstration of the technology, we'd like to suggest an appointment on **April 29 or April 30** in Elk Grove. If those dates do not work for you, please propose alternate dates for the following weeks.

Best,

**Tamiya Davis**

Attorney, Complex Litigation Unit

Office of Legal Affairs

California Department of Corrections and Rehabilitation

Cell: 916.247.5094

---

**From:** Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>

**Sent:** Tuesday, March 11, 2025 10:51 AM

**To:** Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>; Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>; Godbold, Penny <[PGodbold@rbgg.com](mailto:PGodbold@rbgg.com)>; Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>; PLO - Armstrong Team <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>; RBGG - Armstrong Team <[ArmstrongTeam@rbgg.com](mailto:ArmstrongTeam@rbgg.com)>

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**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF



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Hi all,

I'm following up on Ed's email below. Please let us know what the parties think about scheduling a demonstration.

Thanks,

Audrey Barron

---

**From:** Ed Swanson <[ed@smllp.law](mailto:ed@smllp.law)>  
**Date:** Friday, February 28, 2025 at 7:43 PM  
**To:** Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>, Audrey Barron <[audrey@smllp.law](mailto:audrey@smllp.law)>, Godbold, Penny <[PGodbold@rbgg.com](mailto:PGodbold@rbgg.com)>, Patrick Booth <[patrick@prisonlaw.com](mailto:patrick@prisonlaw.com)>, PLO - Armstrong Team <[arm-plo@prisonlaw.com](mailto:arm-plo@prisonlaw.com)>, RBGG - Armstrong Team <[ArmstrongTeam@rbgg.com](mailto:ArmstrongTeam@rbgg.com)>  
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**Subject:** Re: Armstrong: Defendants' Update on Transcription Technology at SATF



All -

In light of this update, I think we should try to schedule a demonstration in anticipation of the technology being ready to show in six weeks. We could always reschedule if the status changes, but with the number of participants and scheduling with an institution required, I think it makes sense to get something on the calendar. Audrey and I are widely available the weeks of April 14 and April 21.

Thanks, and have a good weekend.

Ed

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**From:** Stuter, Ursula@CDCR <[Ursula.Stuter@cdcr.ca.gov](mailto:Ursula.Stuter@cdcr.ca.gov)>  
**Date:** Thursday, February 20, 2025 at 6:25 PM  
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**Subject:** Armstrong: Defendants' Update on Transcription Technology at SATF

All,

As you might recall in Defendants' recent responses to the Court Expert's recommendations regarding SATF, we stated we would "continue to explore AI-generated captioning technology innovations . . . because these technology solutions are continuously and rapidly improving, offer more customization, features, and settings to enhance user experience than traditional CART services." (ECF No. 3656)

Defendants have recently been informed of a very promising technological solution for real time captioning services that has been undergoing testing by the Receiver's team at CCHCS. This solution includes comprehensive, cutting-edge AI-technology with features such as on-demand usage, full screen transcription, customization of display, including font size, contrast, and color, the ability to record and secure a transcription after an encounter, and other helpful functions and features.

The Receiver's Office has advised that, after additional testing and viability analyses, they will be able to demo the technology for Plaintiffs and the Court Expert in approximately six weeks.

Sincerely,

~~~~~

**Ursula Stuter** | Attorney IV | Complex Litigation Unit

California Department of Corrections and Rehabilitation

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VIA EMAIL ONLY

March 21, 2025

Ursula Stuter  
CDCR Office of Legal Affairs

Brianne Burkart  
CCHCS Office of Legal Affairs

RE: *Armstrong v. Newsom*  
Plaintiffs' Requests for Information and Proposals for Captioning Technology  
Demonstration

Dear Ursula and Brianne:

We write regarding the captioning technology that Defendants described by email on February 20, 2025. We appreciate the Receiver's work to identify the technology and Defendants' efforts to prepare the technology for demonstration so that the parties can evaluate whether it is equally effective as an alternative form of communication for deaf and hard-of-hearing people. *See* Dkt. No. 3467 at 3 (Feb. 24, 2023) ("Defendants shall make CART or an alternative reasonable accommodation available" for programming and education "as soon as possible.").

Plaintiffs maintain that the immediate implementation of CART on-site is essential. *See* Dkt. No. 3630 at 106-127 (Plaintiffs' Statement). Deaf and hard-of-hearing people remain isolated from programming, education, religious services, drug and alcohol treatment, and other rehabilitative opportunities while CDCR attempts to identify technologies that can provide communication "as effective as communication with others." *Updike vs. Multnomah Cnty.*, 870 F.3d at 949 (9th Cir. 2017) (quoting 28 C.F.R. § 35.160(a)(1)). Nonetheless, Plaintiffs remain willing to evaluate whether other technologies identified by Defendants, including AI-generated captioning technologies, may prove to be equally effective alternatives.

A thorough and reliable demonstration is an essential for the parties to evaluate this recently identified captioning technology. To ensure that the parties share a clear understanding of the features and specifications of the technology, we make several preliminary requests for information. We also propose parameters for the demonstration that are necessary for Plaintiffs to fairly evaluate the technology and whether it can serve as an equally effective alternative for

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Ursula Stuter & Brianne Burkart  
Re: Information Requests and Proposals for Captioning Demonstration  
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individuals who require speech-to-text to communicate. **We ask to meet regarding these proposed parameters as soon as possible in advance of the demonstrations.**

## **I. Information Requests**

Plaintiffs' counsel request the following information regarding the recently-identified technology. **Please produce this information by April 4, 2025.**

1. Please identify the assistive technology that will be used during the demonstration and the artificial intelligence platform or service upon which it relies.
2. Please provide the make and model of any physical hardware that will be used with the assistive technology during the demonstration, including for audio capture (e.g., microphones) and caption display (e.g., laptops).
3. Please list what physical hardware is compatible with the assistive technology:
  - a. Audio capture (e.g., microphones)
  - b. Caption display (e.g., laptop)
4. Please list what software is compatible with the assistive technology (e.g., Teams, Webex, Zoom).
5. Regarding the assistive technology's display features, please explain:
  - a. How many lines of text can be shown at a time?
  - b. What portion(s) of the screen or caption display can be devoted to text?
  - c. What display customization options are available?
    - i. What options are available to adjust the visible text area?
    - ii. What font style and font size options are available?
    - iii. What font and background color options are available? What color contrast options are available?

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- d. Can other information be displayed via the same technology concurrently with captioning? If so, please describe what information, how it is displayed, and what options exist for changing the relative locations of the captioning and the display of other information.
  - e. Does the technology automatically provide capitalization and punctuation while transcribing? If so, how accurate is this capitalization and punctuation?
  - f. Can the technology identify the speaker or otherwise indicate that the speaker has changed?
- 6. Can specialized terms and acronyms be uploaded to the assistive technology?
  - 7. What performance metrics can be gathered regarding the quality of captioning provided by the assistive technology (e.g., words per minute, accuracy rates, or error rates)?
  - 8. What objective quality standards are required for the assistive technology's performance (e.g., required accuracy rates)?
  - 9. Does the assistive technology or the artificial intelligence platform upon which it relies require an internet connection? If so, what are its connectivity abilities, including whether it can or does use Wi-Fi, Bluetooth, or ethernet? What network will the technology be connected to for the demonstration?
  - 10. What are the assistive technology's error rate and speed of transcription when connected to the internet and when offline?
  - 11. What capabilities does the assistive technology have to filter out ambient noise or to discriminate between speech and background noise?
  - 12. What technical support is available from the assistive technology vendor? Are there any limitations on when technical support is available (e.g., on-demand, certain hours of operation, account caps)?
  - 13. Can the assistive technology transcribe in languages other than English? If so, in which languages?
  - 14. Can the assistive technology provide (a) a raw, uncorrected transcript, and (b) a corrected transcript? If so, how is each transcript provided, and how does the technology and/or vendor certify the transcript?

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## **II. Proposed Parameters for Onsite Demonstration**

As we noted on March 11, 2025, a demonstration that takes place outside a prison environment will not provide sufficient opportunity to evaluate the technology for use in prison programming and education. Consistent with the Court's order regarding the demonstration of the last artificial intelligence-generated captioning technology that Defendants identified, the demonstration also should be conducted in various institutional settings, with a subject matter expert present to answer questions regarding the technology's capabilities. Dkt. No. 3538 at 8.

Accordingly, and based on the parties' experiences last year with the preliminary onsite and subsequent recorded demonstrations of ViewSonic, Plaintiffs' counsel propose the following parameters for the in-prison demonstration of the technology. We also request the parameters marked with an asterisk (\*) for the demonstration that Defendants have proposed at Elk Grove.

1. \*A subject matter expert on the assistive technology must be present to answer questions regarding the technology's capabilities and performance.
2. The technology must be demonstrated in multiple institutional settings in which programming and education regularly occur, including but not limited to:
  - a. a space in which education classes are regularly held;
  - b. a space routinely used for one-on-one medical or mental health appointments;
  - c. a space routinely used for group mental health appointments;
  - d. a space where religious programming is held;
  - e. a space routinely used for vocational programming; and
  - f. a space routinely used for self-help groups.
3. The technology must be demonstrated during live programs. Plaintiffs are willing to collaborate with Defendants on selecting programs and to limit attendance to minimize disruptions to programming, but it is critical that the parties understand how the technology performs in the settings, with the modalities of speech (e.g., presentation, discussion, and conversation), and for the types of speech (e.g., speech patterns, varying pronunciation, and accents) for which it would be used.
4. If the technology uses an internet connection, it must be demonstrated using the same network connection that would be used under typical use conditions.
5. The audio capture tool (e.g., microphone) for the technology must be placed where it would be placed in typical use conditions. For example, if a teacher would typically use a lapel microphone, a lapel microphone should be used when demonstrating the

Ursula Stuter & Brianne Burkart  
 Re: Information Requests and Proposals for Captioning Demonstration  
 March 21, 2025  
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technology in the setting in which education classes are regularly held. We request that Defendants test the internet connection (if necessary to the generation of captions) and any hardware in the presence of the parties to ensure proper functioning.

6. \*If specialized terms and acronyms can be uploaded to the assistive technology, the technology should be loaded with commonly-used terms for the demonstration, such as the following.

|      |             |                          |                           |                |
|------|-------------|--------------------------|---------------------------|----------------|
| 115  | 1824        | 602                      | 602 HC                    | 7362           |
| AA   | ABE         | ADA                      | ADAC                      | Adseg          |
| ASU  | BPH         | CC1                      | CC2                       | CDCR           |
| CGA  | Chrono      | Classification Committee | CTC                       | DNH            |
| DPH  | DPS         | DRP                      | GOGI                      | Goldcoat       |
| ICC  | ISUDT       | LOP                      | NA                        | OHU            |
| PIA  | RAP         | RHU                      | RVR                       | SLI            |
| SOMS | Transitions | UCC                      | Victim Awareness / Impact | VOC / Vocation |

7. \*If the assistive technology has the capacity to generate captions distinguished by speaker, the technology should have speakers and their voices identified before it is demonstrated.
8. \*The demonstration must be audio- and video-recorded. The recording should capture all displays showing captions at one time.
9. \*Each setting in which the technology is shown must be photographed to show the layout, locations of caption display and audio capture devices, and any areas where other programming or education may be happening simultaneously.
10. \*Any and all raw transcripts generated from the technology during the demonstration must be made available to the parties without editing or correction. Any and all corrected transcripts also must be made available to the parties.

We ask that the parties agree in advance on a timeframe by which the demonstration recordings, photographs, and transcripts will be produced so that Plaintiffs' counsel and Plaintiffs' experts can complete an efficient review.

\* \* \* \* \*



Ursula Stuter & Brianne Burkart  
Re: Information Requests and Proposals for Captioning Demonstration  
March 21, 2025  
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Please let us know your availability to meet regarding these parameters as soon as possible. We look forward to the demonstration.

Sincerely yours,

Jerrold Thompson  
Skye Lovett

PRISON LAW OFFICE

Caroline Jackson

ROSEN BIEN GALVAN &  
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